

**REMARKS****Introduction**

Claims 57-93 are pending in the application. By this Response, claims 57, 72, and 88 have been amended. All the amendments are fully supported by the specification as originally filed. No new matter has been added. Reconsideration of this application for allowance of all pending claims are hereby respectfully requested in view of the amendments to the claims and the following remarks.

**Rejection Under 35 U.S.C. §112, First Paragraph**

In this Office Action, claims 57, 72 and 88 have been rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which application regards as the invention. The Examiner particularly stated that “content retrieved by following a link contained in web content” is unclear and requested for clarification. By this Response, the Applicants amended claims 57, 72, and 88 that clarifies the claimed invention. The amended claims 57, 72, and 88 recite “content retrieved by crawling a web site via following links to additional pages”. The Applicants respectfully point out that the concept of “crawling” is well-known and commonly understood by a person ordinary skilled in the art. Content retrieved by crawling a web site, as recited in claims 57, 72, and 88, means to retrieve content contained in web pages obtained by continually following links contained in a web page. For example, if a first web page contains a link to a second web page (different from the first page) and the second page further includes a link to a third web page (different from both the first and the second pages), the crawling of the first web page allows one to retrieve the first, the second, and the third web pages by obtaining the second page and the third page by following the links contained in the first and the second web page. In this example, the content for translation is retrieved “by crawling a web site via following

links to additional pages”, as recited in the amended claims 57, 72, and 88. Therefore, the amended claims clarifies the claimed invention and the Applicants consider the amendment addresses the Examiner’s questions and respectfully request that the rejection under 35 U.S.C. §112, second paragraph, be withdrawn.

**Claim Rejection – 35 U.S.C. § 102**

Claims 57-61, 63-66, 71-76, 78-84 and 87-93 were rejected under 35 U.S.C. §102 (e) as being anticipated by Lakritz U.S. Patent No. 7,207,005 filed December 5, 2007 which is a continuation of U.S. Patent No. 6,526,426 filed January 28, 1999. The Applicants respectfully traverse the rejections.

Independent claims 57, 72, and 88 recite “accessing content in a first language, including content retrieved by crawling a web site via following links to additional pages”. The Applicants respectfully submit that Lakritz does not teach this claimed feature. Lakritz teaches a translation management and process control system (see Abstract, Column 3, line 16) that accesses content stored in a database and loads its components. However, Lakritz does not teach accessing content by crawling a web site via following links to additional pages, as recited in independent claims 57, 72, and 88.

It is well-settled that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Since Lakritz fails to disclose and teach at least two claim elements recited in independent claims 57, 72, and 88, the Applicants respectfully submit that Lakritz does not anticipate claims 57, 72, and 88. Thus, claims 57, 72, and 88 are patentable.

Since claims 58-61, 63-66, and 71-76, 78-84, and 87-93 depend from claims 57, 72, and 88, respectively, they are not anticipated by Lakritz and thus patentable for at least the same reasons as discussed above with respect to independent claims 57, 72, and 88 and for the additional features recited therein. Therefore, the Applicants respectfully request that rejections of claims 57-61, 63-66, 71-76, 78-84 and 87-93 under 35 U.S.C. §102 (e) be withdrawn.

The Examiner did not apply art to claims 62, 67-70, 77, and 85-86 and made no rejections to those claims. The Applicants understood that each of those claims contains patentable subject matter as previously presented. In addition, the Applicants respectfully submit that with the amended independent claims 57, 72, and 88, claims 62, 67-70, 77, and 85-86 are patentable. An express acknowledgement from the Examiner as to their patentability is respectfully requested.

### **Conclusion**

Accordingly, it is believed that all pending claims are now in condition for allowance. Applicant therefore respectfully requests an early and favorable reconsideration and allowance of this application. If there are any outstanding issues which might be resolved by an interview or an Examiner's amendment, the Examiner is invited to call Applicant's representative at the telephone number shown below.

**10/784,868**

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP



Stephen A. Becker

Registration No. 26,527

600 13<sup>th</sup> Street, N.W.  
Washington, DC 20005-3096  
Phone: 202.756.8000 SAB:llg  
Facsimile: 202.756.8087  
**Date: August 14, 2008**  
WDC99 1604169-1.074869.0015

**Please recognize our Customer No. 20277  
as our correspondence address.**